

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

KEITH RANIERE,

Defendant.

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Case No. 1:18-cr-00204-NGG-VMS

**NOTICE OF MOTION**

**REQUEST FOR EVIDENTIARY HEARING**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that upon this Memorandum of Law, dated May 3, 2022, the expert reports of Dr. J. Richard Kiper, Ph.D., PMP, Steven M. Abrams, J.D., M.S., and Wayne Norris, and the exhibits appended to the Memorandum, Mr. Keith Ranieri, by and through his undersigned attorney, Joseph M. Tully, will move before the United States District Judge for the Eastern District of New York to whom this matter is assigned, for an order granting all appropriate relief under Rule 33 of the Federal Rules of Criminal Procedure, as well as all other relief that the Court deems just and proper under the circumstances.

Dated: May 3, 2022  
Martinez, CA

Respectfully submitted,

/s/ Joseph M. Tully  
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